

REMARKS

Formal drawings are presented with improved cross-hatching to indicate a t-shaped window at the lower end of 32 that accepts the t-shape 46 and 46 shown in Figure 3. In essence the segments shown in Figure 3 are first installed into their respective t-shaped receptacles and the assembly is slipped over the mandrel 10 and thread 34 is then made up. It is believed that the formal drawings with proper cross hatching coupled with the specification would readily teach one of ordinary skill in the art how the parts are assembled. It is submitted that the formal drawings address all drawing objections.

The objections to the specification in paragraph 3 of the Office Action have been corrected in paragraphs 0023 and 0025 of the specification.

The claim objections to claims 23 and 24 have been addressed by cancelling them.

Claims 6 and 12 have been amended to address the §112 objections to those claims.

The Examiner rejects claim 1 over Kinley USP 3,191,677. Kinley, when in the expansion mode can only go to the maximum diameter as the segments 29 are driven fully up taper 32 along splines 31 while maintaining full contact with upper travel stop 33. As the swage advances, or tries to advance, it can only do so at maximum diameter. If it hits an obstruction it will simply stall. When pulled out, the segments can then ride down taper 32 to travel stop 34 to get to a smaller dimension, but at that point there is no expansion going on. Claim 1 requires movement during expansion into a plurality of profiles. This feature allows the tool of claim 1 to not get stuck on an obstacle in the tubular being expanded. Kinley has no such capability.

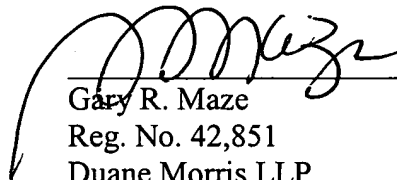
The same can be said of Braddick USP 6,622,789. Figure 1H shows the position before expansion starts. The collets 120 go to max diameter against travel stop 124 which is designed to shear out if the collets get stuck. Again once the collets 120 are in the Figure 1H position they can't assume any other position during expansion. If the ring 124 shears out, there is no longer any expansion possible. The run in position in Figure 2D shows a condition with the collets 120 retracted and no expansion going on. Claim 1 requires a variety of profiles during expansion, something Braddick can't do almost 40

years after Kinley. The remaining rejected claims are submitted to be allowable over the cited art.

A terminal disclaimer is offered to overcome the obviousness type double patenting rejection. The broadest claims not rejected over the cited art have been rewritten in independent form to secure their allowance. All claims are now in condition for allowance and such action is respectfully requested.

Respectfully submitted,

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